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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

RACHELLE CRUPI, individually, and as Special  
Administrator, Personal Representative, and heir to  
the Estate of ALETHA PORCARO, deceased,

Plaintiff,

vs.

THE HEIGHTS OF SUMMERLIN, LLC, a  
foreign limited liability corporation; SUMMIT  
CARE, LLC, a foreign limited liability  
corporation; GENESIS HEALTHCARE, INC., a  
domestic corporation, LATOYA DAVIS,  
individually and as Administrator, ANDREW  
REESE, individually and as Administrator, DOE  
EMPLOYEES I through X; DOE SERVICE  
PROVIDERS I through X; DOE GOVERNING  
MEMBERS I through X; ROE GOVERNING  
BODIES I through X; and DOES XI through XX;  
and ROE CORPORATIONS XI through XX,  
inclusive,

Defendants.

Case No.: 2:21-cv-00954-GMN-DJA

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND DISCOVERY  
DEADLINES**

**[FIRST REQUEST]**

Plaintiff, RACHELLE CRUPI, individually and as Special Administratrix to the Estate of  
ALETHA PORCARO ("Plaintiff"), and Defendants THE HEIGHTS OF SUMMERLIN, LLC,  
SUMMIT CARE, LLC, GENESIS HEALTHCARE, INC., LATOYA DAVIS, individually and as

1 Administrator, ANDREW REESE, individually and as Administrator (“Defendants”) by and through  
2 their respective counsel of record, do hereby stipulate to extend the discovery deadlines in the present  
3 case for a period of 90 days.

4 Pursuant to Local Rule 2.25, the parties hereby aver that this is the first such discovery  
5 extension requested in this matter.  
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7 **DISCOVERY COMPLETED TO DATE**

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- 9 • The parties have conducted an FRCP 26(f) conference;
  - 10 • Plaintiff and Defendants have served their respective FRCP 26(a) disclosures;
  - 11 • Plaintiff has served interrogatories, requests for production, and requests for admissions to  
12 Defendant The Heights of Summerlin, LLC, and Defendant The Heights of Summerlin,  
13 LLC has served responses;
  - 14 • Defendant The Heights of Summerlin, LLC has served interrogatories, requests for  
15 production, and requests for admissions to Plaintiff Rachelle Crupi, individually, and to  
16 Plaintiff Rachelle Crupi, as special administrator, personal representative, and heir to the  
17 Estate of Aletha Porcaro; Plaintiff has not yet served responses to these discovery requests.  
18

19 **DISCOVERY TO BE COMPLETED AND**  
20 **REASONS FOR EXTENSION OF DISCOVERY**

21 Discovery to be completed includes:

- 22
- 23 • Expert disclosures;
  - 24 • Deposition of Plaintiff;
  - 25 • Deposition of FRCP 30(b)(6) witnesses for The Heights of Summerlin, LLC, Summit  
26 Care, LLC, and Genesis Healthcare, Inc.;
  - 27 • Deposition of Latoya Davis, individually and as Administrator;
  - 28 • Deposition of Andrew Reese, individually and as Administrator;
  - Deposition of expert witnesses and treating physicians;
  - Deposition of fact witnesses;

The parties aver, pursuant to Local Rule 2.25, that good cause exists for the requested

extension. Both parties have been diligently working to participate in the discovery process and have both served discovery requests upon the opposing party. However, both parties have several motions pending before Honorable Gloria M. Navarro, including several motions to dismiss and a motion to remand, and are awaiting the decisions regarding such. In light of the decisions on three of Defendants' other cases involving a motion to remand, counsel was waiting to see how the motion in this instant action would be resolved. An extension of 90 days allows time for both parties to set depositions, retain experts, and have reports prepared prior to the expert disclosure deadline.

**~~PROPOSED~~ NEW DISCOVERY DEADLINES**

Expert Disclosure Deadline:

Currently: February 14, 2022

Proposed: May 16, 2022

Rebuttal Expert Disclosure Deadline:

Currently: March 16, 2022

Proposed: June 14, 2022

Discovery Cut-Off Date:

Currently: April 15, 2022

Proposed: July 14, 2022

Dispositive Motion Deadline:

Currently: May 16, 2022

Proposed: August 15, 2022

Joint proposed Pre-Trial Order:

Currently: June 15, 2022

Proposed: September 13, 2022

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1 If the extension is granted, all depositions mentioned above should be concluded within the  
2 stipulated extended deadlines. The parties aver that this request for extension of discovery deadlines  
3 is made by the parties in good faith and not for the purpose of delay.  
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5 DATED this 31st day of January, 2022.

DATED this 31st day of January, 2022.

6 HENNESS & HAIGHT

MESSNER REEVES LLP

7  
8 /s/ Genevieve Romand, Esq.

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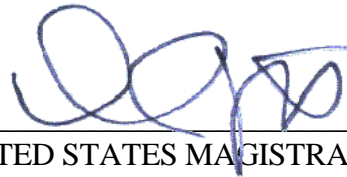
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19 IT IS SO ORDERED this 1st day of February \_\_, 2022.  
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UNITED STATES MAGISTRATE JUDGE